

## **APPENDIX A**

## **PROTOCOL FOR COPYING MEMORY CARDS**

1. The Secretary of State will provide any required encryption information to allow access to those memory cards, if it has changed from the default setting.
2. Dr. Halderman or those working under his direction will copy the data on the memory cards utilizing a memory card reader with a write blocker. No information shall be written to any memory card nor shall any existing information on the memory card be altered.
3. State Defendants have the right to have counsel and designated technical staff on site to observe the Plaintiffs' copying process, at State Defendants' option.
4. All staff, if any, utilized by Plaintiffs and/or their experts in this process shall sign an "Acknowledgement and Agreement to Be Bound" pursuant to the Protective Order in this case and provide a copy of all signed forms to State Defendants.
5. Memory cards shall not be altered by Plaintiffs or their experts, including anyone assisting, in any way through this process. Defendants shall not be responsible for any such alteration that occurs.
6. Plaintiffs' experts shall prepare a central repository of the raw data copied from the memory cards to be provided to State Defendants' experts after service of a discovery request for such information.